

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**STIPULATION AND ORDER WITHDRAWING CLAIM NUMBER 22202**

Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, and Maximilian Coreth (the “Claimant” and together with LBHI, the “Parties”), hereby stipulate and agree as follows:

**RECITALS**

A. On September 15, 2008, LBHI filed a voluntary case under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the “Court”).

B. On September 21, 2009, Claimant filed proof of claim number 22202 against LBHI for \$22,620,000 plus unliquidated and/or undermined amounts (the “Claim”).

C. On March 8, 2013, LBHI filed an objection to the Claim in the four hundredth omnibus objection to claims, dated March 8 (the “Four Hundredth Omnibus Objection to Claims”).

**AGREEMENT**

1. This Stipulation and Order shall become effective upon execution by all Parties and entry by the Court (the “Effective Date”).

2. Upon the Effective Date, without Claimant’s admitting any of LBHI’s assertions, defenses, and/or allegations in the Four Hundredth Omnibus Objection to Claims:

a. the Claim shall be deemed withdrawn with prejudice subject to this Stipulation and Order; and

b. the Court-appointed claims agent shall modify the claims register to reflect the terms of this Stipulation and Order.

3. This Stipulation and Order applies only to the Claim asserted against LBHI. The withdrawal of the Claim is without prejudice to any claims asserted by Claimant against Lehman Brothers Inc.

Dated: April 15, 2013

/s/ Jonathon D. Warner  
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*Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates*

**SO ORDERED:**

**Dated: May 1, 2013  
New York, New York**

**/s/ James M. Peck**

**Hon. James M. Peck  
United States Bankruptcy Judge**